UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO. 3: 20-10
)	
V.)	18 U.S.C. § 641
)	18 U.S.C. § 981(a)(1)(C)
)	18 U.S.C. § 982(a)(7)
SHELIA SHARELLE MERCER)	28 U.S.C. § 2461(c)
)	
)	INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

Between in or about January 2005 and in or about December 2017, in the District of South Carolina, the Defendant, **SHELIA SHARELLE MERCER**, knowingly and willfully did embezzle, steal, and convert to their own use, and the use of others, money in excess of \$1,000 belonging to the United States;

In violation of Title 18, United States Code, Section 641.

FORFEITURE

Upon conviction to violate Title 18, United States Code, Sections 641 as charged in this Indictment, the Defendant, **SHELIA SHARELLE MERCER**, shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offense.

PROPERTY:

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(7), and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Indictment includes, but is not limited to, the following:

CASH PROCEEDS/FORFEITURE JUDGMENT:

A sum of money equal to all proceeds the Defendants obtained directly or indirectly from the offenses charged in the Indictment, that is, a minimum of \$69,062.68 and all interest and proceeds traceable thereto, in that such sum equals property, that the Defendant obtained as the result of her violation of 18 U.S.C. § 641.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendants up to the value of the forfeitable property;

Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(7), and Title 28, United States Code, Section 2461(c).

A True BILL

TOKEPEKSON

A. LANCE CRICK (TDP)

ACTING UNITED STATES ATTORNEY